## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (READING)

IN RE: : Bankruptcy No. 22-11531

:

PATRICK R. STONICH and

JOSEPH C. MOTTO, :

Debtors : Chapter 13

:

: Hearing Date: July 19, 2022: Hearing Time: 10:00 a.m.

:

: United States Bankruptcy Court

The Gateway Building.
201 Penn Street, 4<sup>th</sup> Floor
Reading, Pennsylvania 19601

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Santander Bank, N.A. has filed a Motion for Relief from the Automatic Stay to Exercise its State Court Remedies with regard to the Business Personal Property and Real Estate located at 4315 Washington Street, Schnecksville, Pennsylvania and to Terminate the Appointment of Receiver for Business Real Estate and Personal Care Home.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before July 15, 2022 you or your attorney must do <u>all</u> of the following:
  - (a) file an answer explaining your position at

Clerk, United States Bankruptcy Court Eastern District of Pennsylvania The Gateway Building 201 Penn Street, Suite 103 Reading, Pennsylvania 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

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(b) mail a copy to the movant's attorney:

> Charles N. Shurr, Jr., Esquire Kozloff Stoudt 2640 Westview Drive Wyomissing, Pennsylvania 19610 Telephone: (610) 670-2552

Facsimile: (610) 670-2591

- If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on Tuesday, July 19, 2022 at 10:00 a.m. in the United States Bankruptcy Court, The Gateway Building, Fourth Floor Courtroom, 201 Penn Street, Reading, Pennsylvania 19601.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (610) 208-5030 to find out whether the hearing has been canceled because no one filed an answer.

Date: 5 ul , 2022

**KOZLOFF STOUDT** 

By:

Charles N. Shurr, Jr., Esquire 2640 Westview Drive Wyomissing, PA 19610

(610) 670-2552

Attorneys for Santander Bank, N.A.